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United States Attorney Southern District of New York

United States District Courthouse 300 Quarropas Street White Plains, New York 10601

September 6, 2022

BY ECF

The Honorable Kenneth M. Karas United States District Judge Southern District of New York United States Courthouse 300 Quarropas Street White Plains, New York 10601

VIEMO ENDORSED

Re: United States v. Andrew Perkins, Case No. 21 Cr. 257 (KMK)

Dear Judge Karas:

The Government respectfully writes, with the consent of the defendant, to request an adjournment of the next pretrial conference currently scheduled for September 8, 2022.

As the Court is aware, the parties were last before Your Honor on June 15, 2022, for a pretrial conference. Since that appearance, the parties have reached a potential pretrial resolution and have scheduled a change of plea proceeding before the Honorable Paul E. Davison, United State Magistrate Judge, on September 15, 2022. Accordingly, the parties respectfully request that the Court adjourn the September 8, 2022 pretrial conference. Should the Court grant the adjournment, the Government further respectfully requests, without objection from the defendant, that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), from September 8, 2022 through September 15, 2022, the date of the change of plea hearing. The Government respectfully submits that an exclusion of time would serve the ends of justice and outweigh the best interests of the public and the defendant in a speedy trial because it would allow the defendant time to change his plea.

I have been advised by Ms. Quinn that the defense consents to the foregoing request. The Government respectfully encloses a proposed order excluding time.

The motion to adjourn the 9/8 conference is granted.

Respectfully submitted,

DAMIAN WILLIAMS United States Attorney

by:

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Assistant United States Attorney

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Elizabeth Quinn, Esq. (via ECF)

cc: